

REMARKS

In response to the Office Action dated March 19, 2008, Applicants submit that all pending claims are in condition for allowance, for at least the reasons stated below.

Claims 32 and 40 have been amended to include limitations previously found in claim 37 and have been further amended to provide greater clarity regarding the recited limitations of previously pending claim 37. Claims 32 and 40 now recite that the “at a time” includes a future date and time. This amendment does not add any new matter, see for example page 10, lines 3-9 of the specification as originally filed. Claims 32 and 40 are additionally amended to indicate that the SCPs are “in the telecommunication network,” merely reciting language from the preamble. Claim 37 has been cancelled and claim 38 amended to update dependency.

Claim 32 stands rejected under 35 U.S.C. §102(a) as being anticipated by U.S. Patent No. 5,742,762 (Scholl). Claims 37 and 40 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Scholl in view of U.S. Patent No. 6,076,092 (Goldberg). In view of the amendments to claims 32 and 40, Applicants will address this rejection in view of both Scholl and Goldberg, wherein neither reference, alone or in combination, teaches or suggests all of the claimed limitations.

Scholl, as understood, describes a network management gateway, the network management relating to Internet / Web interconnectivity. As noted in the abstract, the Scholl system utilizes a “web client” for engaging in multi-media activities, including hypermedia translation activities. In its most general terms, Scholl does not relate to a telecommunications network as claimed herein, but rather teaches communication across the web in a web-client and hypermedia environment. This is inconsistent with the claimed service control points (SCPs) as claimed, where the SCPs are “in the telecommunications network.” By comparison, the noted

network management gateway 5 and the network access relate to web access (see, e.g. col. 6, lines 3-32). Scholl's teachings are inconsistent with the claimed "telecommunication network" and the SCPs within this telecommunication network, as to claim 32.

Braddy, as understood, relates generally to managing information requests, including request brokers. For example, Fig. 4 illustrates the request brokerage between various local data stores across networks 75 and 50. Braddy provides for communication between the client (web browser) and application server 92 acting as an interface for the various types of local data stores. By comparison, the claimed business object means as amended to clarify the "message" includes a time element that indicates the request to be processed "at a future date and time." A complete review of Braddy (and Scholl) provides that neither reference teaches nor suggests of this time-based aspect to processing the message, and accordingly the prior art of Braddy and Scholl fail to teach or suggest, *inter alia*, the claimed business object means and the claimed units of work means, as to claim 32.

Claim 40 stands rejected under the similar combination of Scholl and Braddy. For brevity sake, Applicants resubmit the above-offered position regarding the deficiencies of Scholl, Braddy and the combination thereof, including the failure to teach or suggest the service control points being within the telecommunication network and the request including a request for performing an action "at a future date and time."

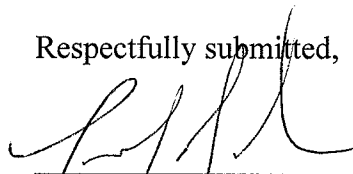
Accordingly, Applicants submit that claims 33-36 and 38-39, as well as 41-43 also recite patentable subject matter in view of the prior art of record and are allowable in view of Scholl, Brady and the additionally cited prior art referenced.

For at least all of the above reasons, the Applicants respectfully request that the claims be presented for examination. To expedite prosecution of this application to allowance, the examiner is invited to call the Applicants' undersigned representative to discuss any issues relating to this application.

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Respectfully submitted,



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